



Counseling and Advising Clients Exclusively on Laws of the Workplace

ZABELL & ASSOCIATES, P.C.
1 CORPORATE DRIVE
SUITE 103
BOHEMIA, NEW YORK 11716
TEL. 631-589-7242
FAX. 631-563-7475
www.Laborlawsny.com

Saul D. Zabell

Email: szabell@laborlawsny.com

February 28, 2014

VIA ELECTRONIC CASE FILING

Honorable Gary R. Brown
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, NY 11722

Re: Rene A. Alas, et al. v. Brothers II Landscapes, Inc., et al.
Case No.: 13-cv-01692 (ADS)(GRB)

Your Honor:

This firm is counsel to all Defendants in the above-referenced matter. We write, with Plaintiffs' consent, to respectfully request a sixty (60) day extension of all remaining case deadlines, including the March 31, 2014 discovery cut-off date.

The basis for this request is that after noting our appearance and engaging in preliminary discovery, counsel for respective parties engaged in a substantive discussion with respect to a possible negotiated resolution of this dispute. In the immediate aftermath of this discussion, counsel agreed to meet with a mutually respected colleague in an effort to mediate the dispute. At present, counsel is scheduled to meet on the evening of March 12, 2014, at which point, the parties are confident they will be able to reach an agreement.

However, failing such an occurrence, the parties are confident that should Your Honor see fit to grant the desired extension, all discovery, including depositions, will be completed within the proposed extended time period.



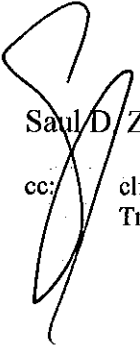
Honorable Gary R. Brown
February 28, 2014
Page 2 of 2

In short, the parties are only requesting such an extension on the odd chance settlement cannot be reached; however, we have every expectation that in light of highly productive conversations, the matter can and will ultimately be resolved.

Counsel for both parties remain available should Your Honor require additional information in connection with this submission.

Respectfully submitted,

ZABELL & ASSOCIATES, P.C.



Saul D. Zabell

cc: client
Troy Kessler, Esq. (*via* electronic case filing)